

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
	:	
v.	:	DATE FILED: _____
	:	
EMORY EDWARD REED	:	VIOLATIONS:
GARY WILLIAMS	:	18 U.S.C. § 371 (Conspiracy - 1 count)
	:	18 U.S.C. § 2113 (a)( Bank robbery -
	:	7 counts)
	:	18 U.S.C. § 2 (Aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Fleet Bank was a federally insured bank with a branch office located at 6 Trenton Avenue, Morrisville, Pennsylvania.
2. Sovereign Bank was a federally insured bank with a branch office located at 131 Wilmington-West Chester Pike, Concordville, Pennsylvania.
3. Madison Bank was a federally insured bank with a branch office located at 600 West Lancaster Avenue, Wayne, Pennsylvania.
4. Commerce Bank was a federally insured bank with a branch office located at 624 Oxford Valley Road, Bristol Township, Pennsylvania.
5. From in or about July, 2003, to on or about August 20, 2003, in the Eastern District of Pennsylvania, defendants

EMORY EDWARD REED and  
GARY WILLIAMS

conspired and agreed to commit four bank robberies, in violation of Title 18, United States Code, Section 2113 (a).

#### MANNER AND MEANS

It was part of the conspiracy that:

6. Defendant EMORY EDWARD REED robbed banks and provided a getaway car for defendant GARY WILLIAMS to use for the purpose of driving defendant EMORY EDWARD REED away from bank robberies.

#### OVERT ACTS

7. On or about July 22, 2003, defendant EMORY EDWARD REED presented a note demanding money to a teller at Fleet Bank, 6 East Trenton Avenue, Morrisville, Pennsylvania, and unlawfully obtained United States currency.

8. On or about July 22, 2003, defendant EMORY EDWARD REED fled Fleet Bank with approximately \$4,595 in bank robbery proceeds.

9. On or about July 22, 2003, defendant GARY WILLIAMS drove defendant EMORY EDWARD REED away from Fleet Bank after defendant EMORY EDWARD REED had robbed the bank.

10. On or about July 29, 2003, defendant EMORY EDWARD REED presented a note demanding money to a teller at Sovereign Bank, 131 Wilmington-West Chester Pike, Concordville, Pennsylvania, and unlawfully obtained United States currency.

11. On or about July 29, 2003, defendant EMORY EDWARD REED fled Sovereign Bank with approximately \$3,572 in bank robbery proceeds.

12. On or about July 29, 2003, defendant GARY WILLIAMS drove EMORY

EDWARD REED away from Sovereign Bank after defendant EMORY EDWARD REED had robbed the bank.

13. On or about August 8, 2003, defendant EMORY EDWARD REED presented a note demanding money to a teller at Madison Bank, 600 West Lancaster Avenue, Wayne, Pennsylvania, and unlawfully obtained United States currency.

14. On or about August 8, 2003, defendant EMORY EDWARD REED fled Madison Bank with approximately \$3,900 in bank robbery proceeds.

15. On or about August 8, 2003, defendant GARY WILLIAMS drove defendant EMORY EDWARD REED away from Madison Bank after defendant EMORY EDWARD REED had robbed the bank.

16. On or about August 20, 2003, defendant EMORY EDWARD REED presented a note demanding money to a teller at Commerce Bank, 624 Oxford Valley Road, Bristol Township, Pennsylvania, and unlawfully obtained United States currency.

17. On or about August 20, 2003, defendant EMORY EDWARD REED fled Commerce Bank, with approximately \$3,700 in bank robbery proceeds.

18. On or about August 20, 2003, defendant GARY WILLIAMS drove defendant EMORY EDWARD REED away from Commerce Bank after defendant EMORY EDWARD REED had robbed the bank.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 18, 2003, in the Eastern District of Pennsylvania, defendant

EMORY EDWARD REED

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of First Penn Bank, 213 West Street Road, Feasterville, Pennsylvania, lawful currency of the United States, that is, approximately \$4,010, belonging to, and in the care, custody, control, management and possession of the bank, the deposits of which were and are insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 22, 2003, in the Eastern District of Pennsylvania, defendants

EMORY EDWARD REED, and  
GARY WILLIAMS

knowingly and unlawfully, by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of Fleet Bank, 6 East Trenton Avenue, Morrisville, Pennsylvania, lawful currency of the United States, that is, approximately \$4,595, belonging to, and in the care, custody, control, management and possession of the bank, the deposits of which were and are insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about July 29, 2003, in the Eastern District of Pennsylvania, defendants

EMORY EDWARD REED, and  
GARY WILLIAMS

knowingly and unlawfully, by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of Sovereign Bank, 131 Wilmington-West Chester Pike, Concordville, Pennsylvania, lawful currency of the United States, that is, approximately \$3,572, belonging to, and in the care, custody, control, management and possession of the bank, the deposits of which were and are insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 2, 2003, in the Eastern District of Pennsylvania, defendants

EMORY EDWARD REED

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of Progress Bank, 2817 Street Road, Bensalem, Pennsylvania, lawful currency of the United States, that is, approximately \$4,904, belonging to, and in the care, custody, control, management and possession of the bank, the deposits of which were and are insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Section 2113(a).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 8, 2003, in the Eastern District of Pennsylvania, defendants

EMORY EDWARD REED, and  
GARY WILLIAMS

knowingly and unlawfully, by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of Madison Bank, 600 West Lancaster Avenue, Wayne, Pennsylvania, lawful currency of the United States, that is, approximately \$3,900, belonging to, and in the care, custody, control, management and possession of the bank, the deposits of which were and are insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.



COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 15, 2003, in the Eastern District of Pennsylvania, defendants

EMORY EDWARD REED

knowingly and unlawfully, by force and violence, and by intimidation, took from employees of First Federal Savings and Loan, 16 Highland Parkway, Levittown, Pennsylvania, lawful currency of the United States, that is, approximately \$2,147, belonging to, and in the care, custody, control, management and possession of the bank, the deposits of which were and are insured by the Federal Deposit Insurance Corporation.

In violation of title 18, United States Code, Section 2113(a).

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 20, 2003, in the Eastern District of Pennsylvania, defendants

EMORY EDWARD REED, and  
GARY WILLIAMS

knowingly and unlawfully, by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of Commerce Bank, 624 Oxford Valley Road, Bristol Township, Pennsylvania, lawful currency of the United States, that is, approximately \$3,700, belonging to, and in the care, custody, control, management and possession of the bank, the deposits of which were and are insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

\_\_\_\_\_  
PATRICK L. MEEHAN  
United States Attorney